

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Federally-Enforceable permit No. F-06-034 (Initial)  
BOSCH REXROTH CORPORATION  
LEXINGTON, KENTUCKY  
September 8, 2006  
MIN WANG  
AFS Plant I.D. 21-067-00056  
AI# 1091, APE# 20060002

**SOURCE DESCRIPTION:**

Bosch Rexroth Corporation (will be referred as 'Bosch') is located at 1953 Mercer Rd., Lexington, Kentucky. The primary operations at the facility are the machining of components and assembly of these components with purchased items to form hydraulic and pneumatic cylinders and pneumatic valves used in industrial operations for drive, motion and control. Bosch has processes such as Cut off Saw, Metal Processing (grinding, metal cutting, drilling, metal milling), Welding, and two Spray Booths for painting the parts.

**COMMENTS:**

Bosch has been operating under O-88-049 since 1989 and C-93-065 was issued to the facility for an additional open-top vapor degreaser in 1993. In 1999, Bosch submitted conditional major application, and then in 2004, the facility asked to withdraw the conditional major application since the open top vapor degreaser with Trichloroethylene was removed from the facility, however, KYDAQ found that potential to emit (PTE) of Xylene and Toluene from two spray booths was still more than 10 tpy, so the facility resubmitted the conditional major application on Feb. 16, 2006, and additional required information was received by KYDAQ on June 7, 2006.

Bosch requests emission limitation to restrict the plantwide HAPs emission rates to be less than 22.5 tons per year and the emissions of an individual hazardous air pollutant shall not exceed 9.0 tons per year to preclude Title V applicability. Therefore, 401 KAR 52:030, Federally-enforceable permits for non-major sources, is applicable for the source.

**PUBLIC AND U.S. EPA REVIEW:**

On August 1, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *Lexington Herald Leader* in Lexington, Kentucky. The public comment period expired 30 days from the date of publication.

***Comment received***

Comment was received from Bosch Rexroth on August 18, 2006. There was only one comment on Statement of Basis (SOB), which the facility only had one degreaser instead of two degreasers stated in SOB, and it has been corrected. There is no comment on permit itself, therefore, no change has been made to the draft permit.

#### **EMISSION AND OPERATING CAPS DESCRIPTION:**

1. Hazardous air pollutants (HAPs) emissions shall not exceed 9 tons per year individually and 22.5 tons per year combined based on a rolling 12month total for the entire source to preclude a major source Title V review.

#### **TYPE OF CONROL AND EFFICIENCY:**

Particulate Matter Emissions from two spray booths are controlled by fabric filter. Control efficiency is 99.9%. There is no control device for emissions of HAPs and VOCs.

#### **APPLICABLE REGULATIONS AND EMISSION LIMITATIONS:**

**Regulation 401 KAR 61:020, Existing process operations**, applies to emissions of particulates from two spray booths (EP03 & 05) since they were constructed before July 2, 1975. Pursuant to 401 KAR 61:020, visible emissions shall not equal or exceed 40% opacity and PM emissions shall not equal or exceed 2.58 lbs/hr from the spray booths operation.

#### **NON-APPLICABLE REGULATIONS:**

**401 KAR 59:225, Miscellaneous Metal Parts & Surface Coating Processes**, does not apply to emissions of VOCs from two spray booths since the affected facility is not a major source.

**40 CFR 63 subpart MMMM, National Emission standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products**, does not apply to emissions of HAPs from two spray booths since the affected facility is not a major source.

#### **EMISSION FACTORS AND THEIR SOURCE:**

Material balances were used to estimate emissions.

#### **PERIODIC MONITORING:**

1. Weekly observation of visible emissions during operation of two spray booths.
2. Annual Method 9 readings during operation of two spray booths.

#### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.